

Exhibit D

*Excerpts of April 11, 2025
Deposition of Dr. Barber*

1 District 75? I will take it as a standing
2 stipulation you don't know which elections these
3 are. I will represent to you it's the standard
4 composite from Daves Redistricting.

5 MS. RIGGINS: Objection. Doctor Barber,
6 you can answer to the extent you know and this
7 exhibit actually shows you the top of the
8 cluster, which I'm not sure it does. But go
9 ahead.

10 A. It looks like there is one, two -- it
11 looks like there's possibly four precincts that
12 he could choose from if he were to select from
13 District 75. All four of those appear to have a
14 Republican lean to some degree, some more than
15 others.

16 Yeah. There is variation there. So
17 there's, you know, a few options available to him
18 there. I would just also note that 91 is
19 adjacent to other -- other districts. And so
20 there is, you know, other -- as he says, there is
21 like probably other potential configurations that
22 one could do as well in this grouping.

23 Q. But of those VTDs that could move from
24 HD 75 to HD 91 while still being contiguous, all
25 of those VTDs moving from anyone -- let me